

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

DORIS ANN SCOTT and ORIEL MOORE,

Plaintiffs,

v.

TREVOR FOLEY, in his official and individual capacity as DIRECTOR of the MISSOURI DEPARTMENT OF CORRECTIONS, et al.,

Defendants.

Case No. 2:24-cv-04107-MDH

**DEFENDANT BRYANNE BRADSHAW'S AGREED MOTION FOR
ENLARGEMENT OF TIME FOR REPLY BRIEFING**

Defendant Bryanne Bradshaw, with Plaintiffs' consent, respectfully moves the Court to extend the deadline for her to file a reply in support of her Motion to Stay Case (Dkt. 88) by seven (7) days, such that the reply briefing is due March 26, 2025.

This is said Defendant's first request for an enlargement of the time to submit her reply and is sought in advance of the current deadline of March 19, 2025. Said Defendant's counsel is need of additional time due to the press of other business, including trial preparation and out-of-town travel. Plaintiffs have agreed to the requested enlargement of time.

WHEREFORE, Defendant Bradshaw seeks entry of an Order of the Court enlarging the deadline for the filing of a reply in support of her Motion to Stay to March 26, 2025 and for such other and further relief as the Court deems just and appropriate.

Respectfully submitted,

BATY OTTO SCHEER P.C.

/s/ Jennifer Donnelly

Theresa A. Otto MO #43453
Jennifer Donnelly MO #47755
Stephanie M. Burton MO #63458
4435 Main Street, Suite 1100
Kansas City, MO 64111
Telephone: (816) 531-7200
Facsimile: (816) 531-7201
totto@batyotto.com
jdonnelly@batyotto.com
sburton@batyotto.com

**ATTORNEYS FOR DEFENDANT
BRYANNE M. BRADSHAW**

CERTIFICATE OF SERVICE

This certifies the foregoing was filed with the Court via the Court's e-filing system on March 18, 2025, with copies the same day via electronic mail to:

Andrew M. Stroth (admitted Pro Hac Vice)
ACTION INJURY LAW GROUP
22 W. Washington Street, #1600
Chicago, IL 60602
Telephone: (844) 878-4529
astroth@actioninjurylawgroup.com

Steven Hart (admitted Pro Hac Vice)
James Ormond (admitted Pro Hac Vice)
HART MCLAUGHLIN & ELDRIDGE, LLC
22 W. Washington Street, #1600
Chicago, IL 60602
Telephone: (312) 955-0545
shart@hmelegal.com
jormond@hmelegal.com

Larry Disparti (admitted Pro Hac Vice)
DISPARTI LAW, LLC
121 W. Wacker Drive, Suite 2300
Chicago, IL 60601

J. Thaddeus Eckenrode, #31080
ECKENRODE-BAUMAN
11477 Olde Cabin Rd., Suite 110
St. Louis, MO 63141
Telephone: (314) 726-6670
Facsimile: (314) 726-2106
jte@eckenrode-law.com

**Attorneys for Defendant
Centurion of Missouri, LLC**

Scott R. Pool, #42484
GIBBS POOL AND TURNER, P.C.
3225 A Emerald Lane
Jefferson City, MO 65109
Telephone: (573) 636-2614
Facsimile: (573) 636-6541
pool@gptlaw.net

**Attorneys for Defendants Davison, Williams,
Wells, Glatczak, Nkwocha and Kopp**

Telephone: (312) 506-5511
ldisparti@dispartilaw.com

Ben Stelter-Embry MO #65404
EMBRY LAW, LLC
4700 Bellevue, Suite 300
Kansas City, MO 64112
Telephone: (913) 231-9396
ben@embry-law.com

Attorneys for Plaintiffs

Dennis S. Harms, #58937
Edna Besic, #76991
SANDBERG PHOENIX & von GONTARD P.C.
701 Market Street, Suite 600
St. Louis, MO 63101-1826
Telephone: (314) 231-3332
Facsimile: (314) 241-7604
dharms@sandbergphoenix.com
ebesic@sandbergphoenix.com
Attorneys for Defendant Jennifer Long

Ryan Bertels, #55167
SCHREIMANN, RACKERS & FRANCKA, L.L.C.
931 Wildwood Drive, Suite 201
Jefferson City, MO 65109
Telephone: (573) 634-7580
Facsimile: (573) 635-6034
rb@srfblaw.com
Attorneys for Defendants Leggins, Case, Brown and Varner

Kevin M. Smith, #51599
ANDREW BAILEY Attorney General
Deputy Chief Counsel – Litigation
615 E. 13th Street, Suite 401
Kansas City, MO 64106
Telephone: (816) 889-5106
Kevin.smith@ago.mo.gov
Attorneys for Defendants Foley and Morris

/s/ Jennifer Donnelly

Attorney for Defendant